REMARKS

Claims 1-19 are pending in the present application. Claims 1-3, 7-9, 12 and 13 have been amended.

Applicant respectfully requests reconsideration of the application in view of the foregoing amendments and the remarks below.

Applicant appreciates the time Examiner Kitov and SPE Sircus devoted to discussing the prior art of record and claims during a telephone interview on February 14, 2006, with Applicant's attorney, Larry Meier, and with Applicant, Steve Voldman. During the telephone interview, the Li et al., Lin et al and Blossfield et al. references were discussed. In addition, proposed changes to the claims were discussed. The meaning of "adaptive clamp network" was also discussed. No agreement was reached concerning allowable subject matter.

Rejection under 35 U.S.C. § 103 based on Li et al., Lin et al. and Texas Instrument Application Report SLYA014A

Claims 1 and 6 have been rejected under 35 U.S.C. § 103 based on Li et al., Lin et al. and Texas Instrument Application Report SLYA014A (the "TI Report"). Applicant's invention, as now claimed, calls for a latchup control network (e.g., in claim 1) or an active clamp network (e.g., in claim 7) that "is positioned in series between said power rail and said sea of gates so as to receive perturbations in voltage potential in said substrate arising from latchup events in said substrate . . . ." The Li et al. and Lin et al. references do not teach or suggest such series connection. Rather, they feature a parallel connection in structure most analogous (albeit not particularly analogous) to the latchup control network or adaptive control network of Applicant's invention. The TI Report is relevant for its description of the general problem motivating the invention. It does not teach or suggest any devices directly related to the claimed invention.

Given the absence of a teaching or suggestion in the Li et al. and Lin et al. references of the series connection now recited in claim 1, and the general lack of relevance of the TI Report, it is respectfully submitted that claim 1 is patentable. As to claim 6, none of the references of record teach the use of an inverter circuit in the context of the integrated circuit of claim 1. For this reason, claim 6 is also patentable.

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Rejection under 35 U.S.C. § 103 based on Li et al., Lin et al., the Texas Instrument Application Report SLYA014A and Blossfield et al.

Claims 2-5 and 7-19 have been rejected under 35 U.S.C. § 103 based on Li et al., Lin et al.. the TI Report and Blossfeld et al. The Blossfeld et al. patent teaches a band gap network in which subcircuits 3 and 5 (FIG. 3) are locked to a fixed DC voltage. While subcircuits 3 and 5, along with cascode circuit 1, are connected in series between VDD and VSS, they are not "adapted to electrically isolate said sea of gates from said power rail in response to undesirable perturbations in said voltage potential in said substrate," as recited, e.g., in claim 1. They cannot since they are not capable of receiving such voltage perturbations. Thus, Blossfeld et al. fail to teach an important limitation in each of the pending independent claims. Other limitations in the dependent claims are also neither taught nor suggested by the references of record.

More generally, the Li et al., Lin et al. and Blossfeld et al. inventions are not particularly related to one another, and there is absolutely no suggestion of mixing and matching various elements to achieve Applicant's invention as now claimed. Indeed, such result could be achieved only through prohibited hindsight reconstruction.

As noted above, the meaning of "adaptive clamp network" was discussed during the telephone interview referenced above. Regardless of whether "adaptive clamp network" is given the broad meaning asserted by Examiner Kitov in the Office Actions, or is construed in accordance with the meaning given the term in the above-identified application, which may be somewhat narrower (the precise scope of the Examiner's interpretation is not clear), the pending claims in the above-identified application remain patentable for the reasons discussed above. Applicant reserves the right to further assert the patentability of the claimed invention based on use of the adaptive clamp network should the claims remain rejected following entry of this response.

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In view of the foregoing, Applicant submits that claims 1-19, as currently presented, are in condition for allowance. Therefore, prompt issuance of a Notice of Allowance is respectfully solicited.

Respectfully submitted,
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